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*Attorneys for The Dow Chemical Company,
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

GENERAL MOTORS CORP., *et al.*,

Debtors.

Chapter 11

Case No. 09-50026 (REG)

Jointly Administered

**NOTICE OF APPEARANCE AND REQUEST FOR ALL NOTICES AND
PLEADINGS PURSUANT TO BANKRUPTCY RULES 2002, 3017 AND 9010(B)**

TO THE CLERK, THE DEBTORS, THE U.S. TRUSTEE AND ALL OTHER PARTIES-IN-INTEREST:

PLEASE TAKE NOTICE that Anne Marie P. Kelley, Anne M. Aaronson, Scott J. Freedman and Matthew Azoulay of Dilworth Paxson LLP and Lee H. Sjoberg of The Dow Chemical Company (“**TDCC**”) hereby request, on behalf of TDCC, Dow Chemical Canada ULC and Essex Specialty Products LLC (collectively with TDCC, “**Dow**”), creditors and parties-in-interest in the above-captioned bankruptcy cases, pursuant to Bankruptcy Rule 9010(b), copies of

all notices and pleadings filed herein or in any related proceedings including notices provided pursuant to Bankruptcy Rules 2002(a), (b) and (f), and 3017(a).

PLEASE TAKE FURTHER NOTICE that the foregoing request encompasses all notices, motions, complaints, answers, applications and orders, whether formal or informal, written or oral, and/or transmitted or conveyed by mail, hand delivery, telephone, telefax, telecopy and/or otherwise. All such notices and pleadings should be sent to:

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PLEASE TAKE FURTHER NOTICE that, by submitting this notice and/or any subsequent appearance, pleading, claim or suit, Dow neither intends nor shall be deemed to waive and, hereby expressly preserves, its right to: (i) have final orders in non-core matters entered only after *de novo* review by a district judge; (ii) a trial by jury in any proceeding so triable in these cases or any related case, controversy or proceeding; (iii) have the reference withdrawn by the United States District Court in any matter subject to mandatory or

discretionary withdrawal; and/or (iv) assert other rights, claims, actions, defenses, setoffs or recoupments to which it is or may be entitled under any agreement, in equity and/or pursuant to applicable law.

Respectfully submitted,

Dated: June 15, 2009

DILWORTH PAXSON LLP

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